

Federal Operating Permit

Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: Pre Con, Inc.

Facility Name: Pre Con, Inc.

Facility Location: 220 S. Perry Street
Petersburg, VA 23804

Registration Number: 51028
Permit Number: PRO51028

June 1, 2004
Effective Date

June 1, 2009
Expiration Date

Director, Department of Environmental Quality

Signature Date

Table of Contents

UPDATED JUNE 2, 2003 1

I. FACILITY INFORMATION 4

II. EMISSION UNITS 5

III. FUEL BURNING EQUIPMENT REQUIREMENTS – (EMISSION UNIT ID#) 6

A. LIMITATIONS.....	NOT APPLICABLE
B. MONITORING [MONITORING AND RECORDKEEPING]	NOT APPLICABLE
C. RECORDKEEPING.....	NOT APPLICABLE
D. TESTING.....	NOT APPLICABLE
E. REPORTING	NOT APPLICABLE

IV. PROCESS EQUIPMENT REQUIREMENTS – (EMISSION UNIT ID#) 6

A. LIMITATIONS.....	6
B. MONITORING [MONITORING AND RECORDKEEPING]	10
C. RECORDKEEPING.....	15
D. TESTING.....	16
E. [REPORTING].....	17

V. FACILITY WIDE CONDITIONS 18

A. LIMITATIONS.....	18
B. MONITORING [MONITORING AND RECORDKEEPING]	19
C. RECORDKEEPING.....	20
D. TESTING.....	20
E. [REPORTING].....	20

VI. INSIGNIFICANT EMISSION UNITS 21

VII. COMPLIANCE PLAN 22

A. DESCRIPTION OF COMPLIANCE REQUIREMENTS	NOT APPLICABLE
B. COMPLIANCE SCHEDULE.....	NOT APPLICABLE
C. REPORTING REQUIREMENTS	NOT APPLICABLE
D. CERTIFIED PROGRESS REPORT	NOT APPLICABLE

VIII. PERMIT SHIELD & INAPPLICABLE REQUIREMENTS 22

IX. GENERAL CONDITIONS 23

A. FEDERAL ENFORCEABILITY	23
B. PERMIT EXPIRATION	24
C. RECORDKEEPING AND REPORTING	24
D. ANNUAL COMPLIANCE CERTIFICATION	26
E. PERMIT DEVIATION REPORTING.....	26
F. FAILURE/MALFUNCTION REPORTING.....	27
G. SEVERABILITY	27
H. DUTY TO COMPLY.....	27
I. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE	27

J. PERMIT MODIFICATION.....	27
K. PROPERTY RIGHTS	28
L. DUTY TO SUBMIT INFORMATION.....	28
M. DUTY TO PAY PERMIT FEES.....	28
N. FUGITIVE DUST EMISSION STANDARDS	28
O. STARTUP, SHUTDOWN, AND MALFUNCTION	29
P. ALTERNATIVE OPERATING SCENARIOS.....	29
Q. INSPECTION AND ENTRY REQUIREMENTS	29
R. REOPENING FOR CAUSE.....	30
S. PERMIT AVAILABILITY.....	30
T. TRANSFER OF PERMITS	30
U. MALFUNCTION AS AN AFFIRMATIVE DEFENSE.....	31
V. PERMIT REVOCATION OR TERMINATION FOR CAUSE	32
W. DUTY TO SUPPLEMENT OR CORRECT APPLICATION.....	32
X. STRATOSPHERIC OZONE PROTECTION.....	32
Y. ASBESTOS REQUIREMENTS	NOT APPLICABLE
Z. ACCIDENTAL RELEASE PREVENTION	32
AA. CHANGES TO PERMITS FOR EMISSIONS TRADING	32
BB. EMISSIONS TRADING	33
X. STATE-ONLY ENFORCEABLE REQUIREMENTS	33

I. Facility Information

Permittee

PreCon, Inc.
P. O. Box 212
Colonial Heights, VA 23834

Responsible Official

Mark Wauford
Vice President

Facility

PreCon, Inc.
220 S. Perry Street
Petersburg, VA 23804

Contact Person

Gene Voss
Pre Con, Inc. General Manager
(804) 733-4974

AFS Identification Number: 51-730-0080

Facility Description: SIC Code Number - 2295, Coated Fabrics Not Rubberized. This is an approximate SIC code. No current SIC code listed exactly fits the description of the facility.

II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Process A - Fiber Coater Line A							
MTO-30	107	30 inch research and development fiber coater, proprietary design	1800 Ft fiber/hr inlet	NONE	—	—	August 5, 1996
Process B - Coating Line B							
PC-30	78	30 inch fiber tape research and development coating line, proprietary design	190 lb/hr fiber and resin inlet	Catalytic Oxidizer, Dec E Tech "Eagle" Model #CO-3000 HT, 3/96	PC-30 CatOx/Stack No. 78	VOC	May 18, 2004
Process C – Coating Line C							
PC-27	76	27 inch fiber tape coating line, proprietary design	60 lbs MeCl/hr coating feed inlet	Two activated carbon adsorbers, Barnebey & Sutcliffe	PC-27 ACA	Methylene Chloride	May 18, 2004
Process D – Polyolefin fiber process line							
XT-2	ST-XT2	Twin screw fiber extruder, proprietary design	120 lbs gel fiber/hr fiber feed inlet	NONE	—	—	May 18, 2004
Process E– Fiber tape line							
PC-63	ST-PC63	Fiber tape line, proprietary design	186.2 lb/hr	Thermal Oxidizer Unit, Glenro 6000	PC-63, TOX-1	VOC & Methyl ethyl ketone	May 18, 2004
Process F – Washer/Dryer line							
WA-1		Polyethylene fiber washer/dryer unit, proprietary design	<551 tons/yr	Thermal Oxidizer Unit Condenser & Adsorber	WA-1-TOX	VOC	May 18, 2004

III. Fuel Burning Equipment Requirements – Not applicable

IV. Process Equipment Requirements – (emission unit ID# MTO-30, PC-30, PC-27, XT-2, PC-63, WA-1)

A. Limitations

1. Methylene chloride emissions from the PC-27 Coater shall be controlled by two activated carbon adsorbers when operating at the 40 feet per minute rated capacity. The activated carbon adsorbers shall be provided with adequate access for inspection. (9 VAC 5-80-110 and Condition 3 of 5/18/04 Permit)
2. VOC emissions from the PC-30 coating mix preparation equipment shall be controlled by installing, operating, and maintaining a cover on each piece of affected coating mix preparation equipment and venting VOC emissions to the catalytic oxidizer, which shall be at correct operating temperature to ensure effective VOC destruction during coating mix preparation of VOC-containing coatings. The catalytic oxidizer shall be provided with adequate access for inspection. (9 VAC 5-80-110 and Condition 4 of 5/18/04 Permit)
3. VOC emissions from the PC-30 Coater shall be controlled by a catalytic oxidizer, which shall be at correct operating temperature to ensure VOC destruction during coating operations using VOC-containing coatings. The catalytic oxidizer shall be provided with adequate access for inspection. (9 VAC 5-80-110 and Condition 5 of 5/18/04 Permit)
4. Particulate emissions from the spray nozzle on the PC-30 Coater shall be controlled by a multi-stage filter. The multi-stage filter shall be provided with adequate access for inspection. (9 VAC 5-80-110 and Condition 6 of 5/18/04 Permit)
5. VOC emissions from the PC-63 coating mix preparation equipment shall be controlled by installing, operating, and maintaining a cover on each piece of affected coating mix preparation equipment and venting VOC emissions to the thermal oxidation unit, which shall be at correct operating temperature to ensure effective VOC destruction during coating mix preparation of VOC-containing coatings. The thermal oxidation unit shall be provided with adequate access for inspection. (9 VAC 5-80-110 and Condition 7 of 5/18/04 Permit)
6. VOC emissions from the PC-63 Coater shall be controlled by a thermal oxidizer unit, which shall be at correct operating temperature to ensure VOC destruction during

coating operations using VOC-containing coatings. The thermal oxidation unit shall be provided with adequate access for inspection.
(9 VAC 5-80-110 and Condition 8 of 5/18/04 Permit)

7. Flammable solvent emissions from the polyethylene fiber washer/dryer process shall be controlled by a thermal oxidizing unit (TOU) equipped with interlock. The TOU shall be provided with adequate access for inspection.
(9 VAC 5-80-110 and Condition 9 of 5/18/04 Permit)
8. Chlorinated Solvent emissions from the polyethylene fiber washer/dryer process shall be controlled by a condenser and carbon bed adsorber. The adsorber shall be provided with adequate access for inspection.
(9 VAC 5-80-110 and Condition 10 of 5/18/04 Permit)
9. The catalytic oxidizer and enclosure shall achieve an overall control efficiency for VOC of no less than 95 percent, on a mass basis.
(9 VAC 5-80-110 and Condition 11 of 5/18/04 Permit)
10. The activated carbon adsorbers and enclosure shall achieve an overall control efficiency for methylene chloride of no less than 95 percent when the PC-27 Coater is operating at the 40 foot per minute rated capacity.
(9 VAC 5-80-110 and Condition 12 of 5/18/04 Permit)
11. The activated carbon adsorbers shall control the exhaust concentration of methylene chloride to no more than 100 ppm from the PC-27 Coater.
(9 VAC 5-80-110 and Condition 13 of 5/18/04 Permit)
12. The thermal oxidation unit and enclosure, which controls emissions from the PC-63 coating line, shall achieve an overall control efficiency for VOC of no less than 98 percent, on a mass basis.
(9 VAC 5-80-110 and Condition 14 of 5/18/04 Permit)
13. The catalytic oxidizer shall maintain an inlet temperature of 385 degrees C. (725 degrees F.) \pm 28 degrees C. (50 degrees F.) and a residence time of at least 0.26 seconds.
(9 VAC 5-80-110 and Condition 15 of 5/18/04 Permit)
14. The thermal oxidizer unit, which controls emissions from the PC-63 coating line, shall maintain a minimum combustion zone temperature of 760 degrees C. (1400 degrees F.) and a residence time of at least 1 second.
(9 VAC 5-80-110 and Condition 16 of 5/18/04 Permit)

15. The carbon bed adsorbers for the polyethylene fiber washing/drying process shall achieve a combined control efficiency for VOC of no less than 95 percent.
(9 VAC 5-80-110 and Condition 17 of 5/18/04 Permit)
16. The thermal oxidizer unit for the polyethylene fiber washing/drying process shall achieve a control efficiency for VOC of no less than 95 percent.
(9 VAC 5-80-110 and Condition 18 of 5/18/04 Permit)
17. The throughput of methylene chloride on PC-27 Coater shall not exceed 215 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 27 of 5/18/04 Permit)
18. The throughput of VOC on PC-30 Coater shall not exceed 460 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 28 of 5/18/04 Permit)
19. The throughput of methyl ethyl ketone on PC-63 Coater shall not exceed 390 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 29 of 5/18/04 Permit)
20. The throughput of total VOC (including methyl ethyl ketone) on PC-63 Coater shall not exceed 1400 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 30 of 5/18/04 Permit)
21. The throughput of fiber to the polyethylene fiber washer/dryer unit shall not exceed 36 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 31 of 5/18/04 Permit)
22. The PC-27 Coater shall only operate at the maximum rated capacity of 40 feet per minute when the methylene chloride emissions are controlled with the activated carbon adsorbers. At all other times, the PC-27 Coater is limited to the operating capacity of 31.6 feet per minute.
(9 VAC 5-80-110 and Condition 32 of 5/18/04 Permit)
23. The twin screw fiber extruder (XT-2) shall only operate a maximum of 2000 hours per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 33 of 5/18/04 Permit)
24. The polyethylene fiber washer/dryer process shall operate a maximum of 6000 hours per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 34 of 5/18/04 Permit)
25. The approved fuel for the thermal oxidizer unit, which controls emissions from the polyethylene fiber washer/dryer process, is natural gas. A change in the fuel may

require a permit to modify and operate.
(9 VAC 5-80-110 and Condition 35 of 5/18/04 Permit)

26. The thermal oxidizer unit, which controls emissions from the polyethylene fiber washer/dryer process, shall consume no more than, 27.0×10^6 cubic feet of natural gas per year, calculated monthly as the sum of each consecutive 12 month period.

Minimum heat content: 1020 Btu/cf HHV.
(9 VAC 5-80-110 and Condition 36 of 5/18/04 Permit)

27. Visible emissions from the catalytic oxidizer, which controls emissions from the PC-30 coating line, shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-50-80, 9 VAC 5-80-110, and Condition 38 of 5/18/04 Permit)

28. Visible emissions from the twin screw fiber extruder (XT-2) shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-50-80, 9 VAC 5-80-110 and Condition 39 of 5/18/04 Permit)

29. Visible emissions from the PC-27 coating line, shall not exceed 20 percent opacity, except for one six-minute period in any one hour of not more than 30 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-50-80 and 9 VAC 5-80-110)

30. Visible emissions from the thermal oxidation unit, which controls emissions from the PC-63 coating line, shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-50-80, 9 VAC 5-80-110, and Condition 40 of 5/18/04 Permit)

31. Emissions from the operation of the facility shall not exceed the limits specified below:

MTO-30 Coater:

Volatile Organic Compounds	22.8 lbs/hr	24.5 tons/yr
----------------------------	-------------	--------------

PC-30 Coater:

Volatile Organic Compounds	5.3 lbs/hr	23.0 tons/yr
----------------------------	------------	--------------

Twin screw fiber extruder (XT-2):

PM & PM ₁₀	7.64 lbs/hr	7.64 tons/yr
-----------------------	-------------	--------------

Polyethylene fiber washer/dryer process

Volatile Organic Compounds	9.8 lbs/hr	29.4 tons/yr
PM & PM ₁₀	0.7 lbs/hr	2.1 tons/yr
CO	0.4 lbs/hr	1.2 tons/yr
NO _x	0.5 lbs/hr	1.4 tons/yr

PC-63 Coater:

Volatile Organic Compounds	6.4 lbs/hr	28.0 tons/yr
----------------------------	------------	--------------

(9 VAC 5-80-110, Permit Condition 6 of 8/5/96 and Permit Condition 37 of 5/18/04 Permit)

B. Monitoring and Recordkeeping

1. The MTO-30 coater shall be observed at least once each calendar week for a brief time period to determine which operating emissions units have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit during that week. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible, and the cause and corrective measures taken are recorded.
(9 VAC 5-80-110)
2. The permittee shall record semi-annual estimates of projected VOC use and the actual 12 month VOC use for the PC-30 and PC-63 coaters. The actual 12 month VOC use shall be calculated monthly as the sum of the previous 12 months.
(9 VAC 5-80-110 and 9 VAC 5-50-410)
3. The PC-27 coater shall be observed at least once each calendar week for a brief time period to determine which operating emissions units have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit during that week. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible, and the cause and corrective measures taken are recorded.
(9 VAC 5-80-110)
4. The permanent total enclosure for the PC-30 and PC-63 coater press shall meet the following criteria:

- (a) Any natural draft openings shall be at least 4 equivalent opening diameters from each VOC emitting point;
- (b) The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling;
- (c) All access doors and windows whose areas are not included as natural draft openings and are not included in the calculation of facial velocity shall be closed during routine operation of the press.
- (d) The average inward facial velocity of air through the natural draft openings shall be at least 3600 meters per hour and the direction of flow shall be into the enclosure.
- (e) The air passing through all natural draft openings shall flow into the enclosure continuously.
- (f) All sources of emission within the enclosure shall be a minimum of four equivalent diameters from each natural draft opening.

Any physical changes made to the enclosure around the PC-30 and PC-63 coaters or modifications to the PC-30 and PC-63 coaters shall be analyzed to ensure that conditions of (a) through (f) above are still met. The results of this analysis shall be provided to the Director, Piedmont Regional Office.
(9 VAC 5-80-110)

- 5. The coating mix preparation equipment associated with the PC-30 coater shall be properly covered. In order to be deemed properly covered the coating mix preparation equipment shall meet the following requirements:
 - (a) Covers shall be closed at all times except when adding ingredients, withdrawing samples, transferring the contents, or making visual inspection when such activities cannot be carried out with cover in place. Such activities shall be carried out through ports of the minimum practical size.
 - (b) Covers shall extend at least 2 centimeters beyond the outer rim of the opening or shall be attached to the rim.
 - (c) Covers shall be of such design and construction such that contact is maintained between cover and rim along the entire perimeter.
 - (d) Any breach in the cover shall be covered consistent with (a) - (c) above when not actively in use.

- (e) A nonpermanent cover may be used provided it meets the requirements of (a) - (d) above and is not reused after once being removed.

The permittee shall maintain procedures detailing the use of covers as described above and shall have the information posted near the coating mix preparation equipment associated with PC-30 coater. The coating mix preparation equipment shall be vented to the catalytic oxidizer while preparation of the coating is taking place within the equipment.

(9 VAC 5-80-110)

6. The activated carbon adsorbers shall be equipped with devices to continuously measure adsorber gas outlet concentration of methylene chloride. If levels of methylene chloride exceed 100 ppm, the device shall trigger an audible and visual alarm that notifies the operators to decrease the PC-27 Coater's capacity to 31.6 feet per minute until the activated carbon is replaced with new carbon. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the activated carbon adsorbers are operating.
(9 VAC 5-80-110 and Condition 19 of 5/18/04 Permit)
7. The catalytic oxidizer, which controls emissions from the PC-30 coating line, shall be equipped with devices to continuously measure and record the gas temperature both immediately upstream and downstream of the catalyst bed. The temperature monitoring device shall have an accuracy within ± 1 percent of the temperature being measured in degrees Celsius ($^{\circ}\text{C}$). Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the catalytic oxidizer is operating.
(9 VAC 5-80-110 and Condition 20 of 5/18/04 Permit)
8. The thermal oxidation unit, which controls emissions from the PC-63 coating line, shall be equipped with devices to continuously measure and record the combustion zone temperature. The temperature monitoring device shall have an accuracy within ± 1 percent of the temperature being measured in degrees Celsius ($^{\circ}\text{C}$). Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the thermal oxidation unit is operating.
(9 VAC 5-80-110 and Condition 21 of 5/18/04 Permit)

9. The polyethylene fiber washer/dryer process thermal oxidizer unit shall be equipped with devices to continuously measure the oxidizer chamber temperature. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the process is operating when a flammable solvent is being utilized.
(9 VAC 5-80-110 and Condition 22 of 5/18/04 Permit)
10. The polyethylene fiber washer/dryer carbon bed adsorber shall be equipped with devices to continuously measure absorber gas outlet concentration of chlorinated solvents. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the activated carbon adsorbers are operating when a chlorinated solvent is being utilized.
(9 VAC 5-80-110 and Condition 23 of 5/18/04 Permit)
11. The monitoring device used to continuously measure the concentration of methylene chloride from the activated carbon adsorbers shall be observed by the permittee with a frequency of not less than once per hour to ensure proper performance of the activated carbon adsorbers. Outlet readings of methylene chloride concentrations from the activated carbon adsorbers shall be conducted every hour. Monitoring of the activated carbon adsorbers shall also include bed inlet readings every 3 hours and readings between the beds every 3 hours. The permittee shall keep a log of the observations and the methylene chloride concentration measurements from the activated carbon adsorbers.
(9 VAC 5-80-110 and Condition 24 of 5/18/04 Permit)
12. The monitoring device used to continuously measure the oxidizer chamber temperature in conjunction with the polyethylene fiber washer/dryer process shall be observed by the permittee with a frequency of not less than once per hour **or** as recommended by the control manufacturer. The permittee shall keep a log of the observations.
(9 VAC 5-80-110 and Condition 25 of 5/18/04 Permit)
13. The monitoring device used to continuously measure the concentration of chlorinated solvents from the polyethylene fiber washer/dryer activated carbon adsorbers shall be observed by the permittee with a frequency of not less than once per hour to ensure proper performance of the activated carbon adsorbers. Outlet readings of chlorinated solvent concentrations from the activated carbon adsorbers shall be conducted every hour. Monitoring of the activated carbon adsorbers shall also include bed inlet readings every 3 hours and readings between the beds every 3 hours. The permittee shall keep a log of the observations and the chlorinated solvent concentration

measurements from the activated carbon adsorbers.
(9 VAC 5-80-110 and Condition 26 of 5/18/04 Permit)

14. The PC-30 coater shall be observed at least once each calendar week for a brief time period to determine which operating emissions units have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit during that week. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible, and the cause and corrective measures taken are recorded.
(9 VAC 5-170-160, 9 VAC 5-50-50 and 9 VAC 5-50-410)
15. The XT-2 shall be observed at least once each calendar week for a brief time period to determine which operating emissions units have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit during that week. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible, and the cause and corrective measures taken are recorded.
(9 VAC 5-170-160, 9 VAC 5-50-50 and 9 VAC 5-50-410)
16. The PC-63 coater shall be observed at least once each calendar week for a brief time period to determine which operating emissions units have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit during that week. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible, and the cause and corrective measures taken are recorded.
(9 VAC 5-170-160, 9 VAC 5-50-50 and 9 VAC 5-50-410)
17. The WA-1 shall be observed at least once each calendar week for a brief time period to determine which operating emissions units have any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit during that week. Each emissions unit observed having any visible emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible, and the cause and corrective measures taken are recorded.
(9 VAC 5-170-160, 9 VAC 5-50-50 and 9 VAC 5-50-410)

C. Recordkeeping

- A. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Regional Director. These records shall include, but are not limited to:
1. The monthly throughput of Volatile Organic Compounds, including exempt VOC's, for each line. Individual constituent usages, including hazardous air pollutants, shall be recorded, in addition to total VOC usage.
 2. The product rate, on a research and development trial basis, in linear feet of fiber product coated and the combined fiber/resin rate also on a research and development trial basis.
 3. The operating times of the coating mix operating equipment associated with the PC-30 Coater along with operating records that indicate all required covers were closed and in use during the use of the coating mix operating equipment. Records shall also include indication that all required equipment was vented to the catalytic oxidizer.
 4. The operating times of the coating mix operating equipment associated with the PC-63 Coater along with operating records that indicate all required covers were closed and in use during the use of the coating mix operating equipment. Records shall also include indication that all required equipment was vented to the thermal oxidation unit.
 5. The operating times where the PC-27 Coater runs at a rate higher than 31.6 feet per minute.
 6. A log of the hourly observations of the two activated carbon adsorbers' monitoring devices and concentration measurements from the two activated carbon adsorbers' exhaust gases.
 7. The operating times where the coating mix operating equipment and the PC-30 Coater process water-based resins.
 8. The operating times where the coating mix operating equipment and the PC-63 Coater process water-based resins.
 9. The inlet and outlet temperature of the catalytic oxidizer bed recorded hourly during all periods when the catalytic oxidizer is in use.

10. The destruction burner temperature of the thermal oxidation unit recorded hourly during all periods when it is in use.
11. The results of all Method 24 analysis performed on any solvent based resin material or its constituents.
12. Material Safety Data Sheets (MSDS) or other vendor information showing VOC content, HAP content, water content, and solids content for each coating and adhesive used.
13. Operation and control device monitoring records for the catalytic oxidizer.
14. Operation and control device monitoring records for the thermal oxidation units.
15. Scheduled and unscheduled maintenance, and operator training.
16. Monthly and annual emissions calculations for methylene chloride from the PC-27 Coater using calculation methods approved by the Piedmont Regional Office to verify compliance with the lb/hr and ton/yr emissions limitations. Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.
17. A log of hours of operation for the twin screw fiber extruder (XT-2).
18. A log of hours of operation for the polyethylene fiber washer/dryer process. Hours of operation shall be recorded at least monthly.
19. A log of fiber throughput to the polyethylene fiber washer/dryer process. Fiber throughput shall be recorded at least monthly.
20. A log of instances when the thermal oxidizer unit shuts down when flammable solvents are being used in the polyethylene fiber washer/dryer process.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110, Condition 10 of 8/5/96 Permit and Condition 43 of 5/18/04 Permit)

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-50-30, 9 VAC 5-80-110, Condition 3 of 8/5/96 Permit and Condition 45 of 5/18/04 Permit)

2. Initial performance tests on the Thermal Oxidation Unit, which controls emissions from the WA-1, shall be conducted for Volatile Organic Compounds (VOCs) from the stack using reference method 24 or 25 (40 CFR 60 Appendix A) to determine compliance with the emission limits and control efficiency requirements contained in Condition 37. The tests shall be performed, reported, and demonstrate compliance within 60 days after achieving the maximum production rate at which the facility will be operated but in no event later than 180 days after start-up of the permitted facility. Tests shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410. The details of the tests are to be arranged with the DEQ Piedmont Regional Office. The permittee shall submit a test protocol at least 30 days prior to testing. Two copies of the test results shall be submitted to the DEQ Piedmont Regional Office within 60 days after test completion and shall conform to the test report format enclosed with this permit.
(9 VAC 5-50-30, 9 VAC 5-80-110, and Condition 42 of 5/18/04 Permit)

E. Reporting

1. The permittee shall report for the PC-30 and PC-63 coaters the first semiannual estimate in which the projected annual VOC use exceeds 100 tons per year. The permittee shall also report the first 12 month period in which the actual VOC use exceeds 100 tons per year. The permittee shall report these results to the Director, Piedmont Regional Office and to:

Chief, Air Enforcement Branch (3AP10)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103

(9 VAC 5-80-110 and 9 VAC 5-50-410)
2. The permittee shall report the results of any 40 CFR Part 60 method 9 opacity test performed as a result of condition (B3) above. If the test indicates the facility is out of compliance with the standard contained in IV. (A) (2), the source shall also report the length of time associated with any exceedance of the standard and the corrective actions taken to correct the exceedance. This report shall be sent to the Director, Piedmont Regional Office.
(9 VAC 5-80-110)
3. The permittee shall maintain records and submit quarterly reports to the Director, Piedmont Regional Office documenting, for the PC-30 Coater, all 3-hour periods (during actual coating operations) during which the average gas temperature immediately before the catalyst bed is more than 28 Celsius degrees below the average

gas temperature during the most recent performance test that demonstrated compliance and all 3-hour periods (during actual coating operations) during which the average gas temperature difference across the catalyst bed is less than 80 percent of the average gas temperature difference during the most recent performance test that demonstrated compliance. Copies of the quarterly reports described in this condition shall also be sent to:

Chief, Air Enforcement Branch (3AT20)
U. S. Environmental Protection Agency
Region III
841 Chestnut Street
Philadelphia, PA 19107

(9 VAC 5-80-110 and Condition 44 of 5/18/04 Permit)

4. The permittee shall furnish written notification to the Piedmont Regional Office:
 - a. The actual start-up date of the polyethylene fiber washer/dryer process within 15 days after such date.
 - b. The anticipated date of performance tests of the polyethylene fiber washer/dryer process postmarked at least 30 days prior to such date.

(9 VAC 5-80-110 and Condition 46 of 5/18/04 Permit)

5. The permittee shall submit a material flow chart indicating projected VOC use along with the notification of anticipated startup for the PC-63.
(9 VAC 5-80-110)

V. Facility Wide Conditions

A. Limitations

1. The permit to construct the polyethylene fiber washer/dryer process shall become invalid, unless an extension is granted by the DEQ, if:
 - a. A program of continuous construction is not commenced before the latest of the following:
 - i. 18 months from the date of this permit;
 - ii. Nine months from the date that the last permit or other authorization was issued from any other governmental agency;
 - iii. Nine months from the date of the last resolution of any litigation concerning any such permits or authorization; or
 - b. A program of construction is discontinued for a period of 18 months or more, or is not completed within a reasonable time, except for a DEQ approved period between phases of a phased construction project.

(9 VAC 5-80-110 and Condition 47 of 5/18/04 Permit)

2. Existing Source Standard for Visible Emissions

Unless specified otherwise in this part, no owner or other person shall cause or permit to be discharged into the atmosphere from any affected facility any visible emissions which exhibit greater than 20% opacity, except for one six-minute period in any one hour of not more than 60% opacity. Failure to meet the requirements of this section because of the presence of water vapor shall not be a violation of this section. This standard is applicable to the following emission units: GB-01, GB-02, GB-03, and GB-04.

(9 VAC 5-80-110 and 9 VAC 5-40-80)

3. The processes listed below shall, upon request of the Department, shut down immediately if its emissions increase in any amount because of a bypass, malfunction, shutdown or failure of the process or its associated air pollution control equipment. The processes shall not return to operation until it and the associated air pollution control equipment are able to operate in a proper manner.

- a. PC-27 Coater
- b. PC-30 Coater
- c. PC-63 Coater
- d. Polyethylene fiber washer/dryer

(9 VAC 5-80-110 and Condition 51 of 5/18/04 Permit)

4. Future Applicable Requirements- 40 CFR 63 MACT Subpart OOOO- National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles- Coaters MTO-30, PC-27, PC-30, and PC-63 are subject to Subpart OOOO of 40 CFR part 63 they fall under 40 CFR 63.4281 (a)(1). According to 40 CFR 63.4283(b) the date the source must comply with this subpart is 3 years after May 29, 2003.

B. Monitoring and Recordkeeping

- 1. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices and process equipment which affect such emissions:
 - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
 - b. Maintain an inventory of spare parts.
 - c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.

- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 5-80-110 and Condition 53 of 5/18/04 Permit)

C. Recordkeeping

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-50-30 and 9 VAC 5-80-110)
2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Methods 18, 25, 25a
VOC Content	EPA Methods 24, 24a
NO _x	EPA Method 7
SO ₂	EPA Method 6
CO	EPA Method 10
PM/PM-10	EPA Method 5, 17
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

E. Reporting

1. The permittee shall furnish notification to the Piedmont Regional Office of the intention to shut down or bypass, or both, air pollution control equipment for necessary scheduled maintenance, which results in excess emissions for more than one hour, at least 24 hours prior to the shutdown. The notification shall include, but is not limited to, the following information:
 - a. Identification of the air pollution control equipment to be taken out of service, as well as its location, and registration number;

- b. The expected length of time that the air pollution control equipment will be out of service;
 - c. The nature and quantity of emissions of air pollutants likely to occur during the shutdown period;
 - d. Measures that will be taken to minimize the length of the shutdown or to negate the effect of the outage.
- (9 VAC 5-80-110 and Condition 49 of 5/18/04 Permit)

2. Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact. The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, 2.1-340 through 2.1-348 of the Code of Virginia, 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.
- (9 VAC 5-80-110 and Condition 56 of 5/18/04 Permit)

VI. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
	Ballistics/R&D/ QC Lab Hood	5-80-20-A.18	Negligible	NA
	Edge Trimming / Cross Ply finishing equipment	5-80-20 A.54.	Negligible	NA
Plasma Units	Plasma Units (3)	5-80-720 B.	CO, NOx	550 watts
30PC	30 inch Coater-Lab Hood	5-80-720 B.	Methylene Chloride	6.75 ft.2 opening

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
	Safety-Kleen Parts Washer	5-80-720 B.	VOC	Cold Cleaner
MTO-30 DO	MTO-30 Coater Drying Oven	5-80-720 C.	NO _x , VOC, CO, PM ₁₀ , SO ₂ , Benzene	0.80 MMBTU/hr
GB-01	Boiler, Perry Building, 2nd. Floor	5-80-720 C.	NO _x , VOC, CO, PM ₁₀ , SO ₂ , Benzene	2.7 MMBTU/hr
GB-02	Boiler, Perry Building, 2nd. Floor	5-80-720 C.	NO _x , VOC, CO, PM ₁₀ , SO ₂ , Benzene	2.7 MMBTU/hr
GB-03	Boiler, Cameron Bldg.	5-80-720 C.	NO _x , VOC, CO, PM ₁₀ , SO ₂ , Benzene	1.5 MMBTU/hr.
GB-04	Boiler, Cameron Bldg.	5-80-720 C.	NO _x , VOC, CO, PM ₁₀ , SO ₂ , Benzene	1.5 MMBTU/hr.
30PC-CATOX	Coating System PC-30, Catalytic Oxidizer Burner	5-80-720 C.	NO _x , VOC, CO, Particulate PM ₁₀ , SO ₂ , Benzene	1.95 MMBTU/hr.
D-X	Experimental gel fiber washing unit	5-80-720 B.	VOC, HCFC-141(b), CRC-113	3.75 batches/day
WA-X	Experimental gel fiber dryer unit	5-80-720 B.	VOC, HCFC-141(b), CRC-113	6 lbs fiber/day
LAB	Quality Control Lab	5-80-720 B.	Dihydroperfluoropen tane	36 tests/day
DW	Experimental drum fiber winder	5-80-720 B.	VOC	25 ft fiber/min
S-X	Experimental Spinning Unit	5-80-720 B.	VOC, PM	2.83 lb/hr

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

VII. Compliance Plan – Not applicable

VIII. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all

applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of applicability
40 CFR §60.742 (b)(1)	40 CFR 60 Subpart VVV Standards for Volatile Organic Compounds - emission reduction standard	The facility has applied 40 CFR §60.742 (b)(2), the alternative standard as provided for in the subpart.
40 CFR §60.742 (b)(1)	40 CFR 60 Subpart VVV Standards for Volatile Organic Compounds - emission reduction standard	The standard does not apply to the MTO-30 coater because the source has accepted a throughput limit below the applicability limit of the standard.
9 VAC 5-50-80	New Source standard for Visible Emissions	For the emissions units listed in this permit either 9 VAC 4-40-80 the Visible Emissions Standard for Existing Sources or the more stringent BACT standard for VOC sources has been applied.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140)

IX. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
 - a. The date, place as defined in the permit, and time of sampling or measurements.
 - b. The date(s) analyses were performed.

- c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses.
 - f. The operating conditions existing at the time of sampling or measurement.
(9 VAC 5-80-110 F)
2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
(9 VAC 5-80-110 F)
3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
 - b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:
 - (1) Exceedance of emissions limitations or operational restrictions;
 - (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,
 - (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
 - c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that “no deviations from permit requirements occurred during this semi-annual reporting period.”

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1 to December 31.
2. The identification of each term or condition of the permit that is the basis of the certification.
3. The compliance status.
4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
6. Such other facts as the permit may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00)
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029.
(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, Piedmont Region within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The

occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition IX.C.3. of this permit.
(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Piedmont Region by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Piedmont Region.
(9 VAC 5-20-180 C)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110 G.3)

J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may

be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1790, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios. (9 VAC 5-80-190 and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality. (9 VAC 5-80-110 G.6)
2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G. (9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department. (9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;

2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;
4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20 E)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.

(9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.

(9 VAC 5-80-160)

2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)
3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.
2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
 - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
 - b. The permitted facility was at the time being properly operated.
 - c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
 - d. The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F 2 b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.
3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.

4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.
(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any of the grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-190 C and 9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)

Y. Asbestos Requirements- Not Applicable

Z. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

AA. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110 I)

BB. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.
(9 VAC 5-80-110 I)

X. State-Only Enforceable Requirements

The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements, and are not subject to the requirements of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.

1. Emissions from the operation of the MTO-30 inch fiber coating facility shall not exceed the limits specified below:

Toluene	10.0 lbs/hr	24.5 tons/yr
Styrene	14.0 lbs/hr	24.5 tons/yr
Methanol	10.0 lbs/hr	24.5 tons/yr
Methyl Ethyl Ketone	22.8 lbs/hr	24.5 tons/yr
Methylene Chloride	11.0 lbs/hr	24.5 tons/yr

(9 VAC 5-50-260 and 9 VAC 5-50-180, Condition 5 of the 8/5/96 permit)

2. The annual throughput of methylene chloride on PC-27 Coater shall not exceed 215 tons, calculated as monthly sum for each calendar year.
(9 VAC 5-50-260, Condition 27 of the 5/18/04 permit)

3. Emissions from the operation of the facility shall not exceed the limits specified below:

PC-27 Coater:

Methylene Chloride	60.0 lbs/hr	188.0 tons/yr
--------------------	-------------	---------------

PC-30 Coater:

Methyl Ethyl Ketone 5.3 lbs/hr 23.0 tons/yr

PC-63 Coater:

Methyl Ethyl Ketone 1.8 lbs/hr 7.9 tons/yr

(9 VAC 5-80-110 N and 9 VAC 5-80-300, Condition 37 of the 5/18/04 permit)